

6.9.1.2



Steven_Hughes@urscorp.com

11/19/2001 03:15 PM

To: Marykay Voytilla/R10/USEPA/US@EPA

cc: jstefano@ch2m.com

Subject: Comments on CTP response to comments

for the delay. Chuck and Eric did not have any comments not covered in Dave's response.

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----- Forwarded by Steven Hughes/Seattle/URSCorp on 11/19/01 03:16 PM -----

Dave Walker

Hughes/Seattle/URSCorp@URSCORP
11/09/01
Vita/Seattle/URSCorp@URSCORP
08:57 AM
to comments

To: Steven
cc: Chuck
Subject: Comments on CTP response

I have only a few comments:

1. Page 4, response to comment 1.7, 2nd para., 3rd sent. I believe this should read "...- it does not usurp the South Fork waste load allocation."
2. Page 23, response to comment 3.3, 2nd para., 2nd sent. I believe this should read "... will not increase the amount of sludge generated,..."
3. Page 34, response to comment 6.6, 1st para., last sent. I believe this should read "... (see response to comment 6.5) "
4. Page 44, response to comment 10.3. I think this response should emphasize the need to treat the AMD for protection of aquatic life. Wouldn't release of untreated AMD to the South Fork result in concentrations of zinc and cadmium that are toxic to fish even if all other sources of metals were cleaned up? Further, potential human exposure to metals in AMD that aren't taken as supplements (i.e., lead, cadmium) should be pointed out. I don't think the need to protect humans from zinc and silver exposures is the main reason for treating the AMD.

Are the human health effects cited for zinc and silver based on chronic toxicity? If so, it seems far-fetched to assume people might consume untreated AMD on a daily basis.

Dave Walker, P.E.



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